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VIA ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
U.S.D.C., Eastern District of New York
225 Cadman Plaza East, Chambers 304N
Brooklyn, NY 11201

Re: *Walls v. Beech-Nut Nutrition Corp.* Case No. 1:21-cv-870-DG-SJB
Letter Motion for Continuance of Certain Deadlines re: Hain Celestial

Dear Judge Bulsara:

I represent Defendant The Hain Celestial Group, Inc. in the above-referenced action. Pursuant to Section II.A of this Court's Individual Practice Rules, I write to request a further continuance of Hain Celestial's deadline to file a responsive pleading from April 19, 2021 to June 18, 2021.

Hain Celestial seeks this extension in light of two pending motions that bear on the status of this case: (1) a motion filed by the plaintiffs in *Stewart v. Hain Celestial Group, Inc.*, Case No. 2:21-cv-678 (E.D.N.Y.), to consolidate all of the pending "baby food" lawsuits against Hain Celestial into a single proceeding in this District before Judge Seybert; and (2) a motion filed by the plaintiffs in *Albano v. Hain Celestial Group*, Case No. 2:21-cv-1118 (E.D.N.Y.) to consolidate all of the "baby food" cases in the United States—including both those against Hain Celestial and those against other manufacturers—into a single multidistrict litigation pursuant to 28 U.S.C. § 1407. Because an order granting either of those motions would result in the reassignment and consolidation of this action, it is premature to require Hain Celestial to submit a responsive pleading at this time.

This is Hain Celestial's second request for an extension or adjournment of any kind, and the extension will not affect any pending deadlines set by Court order. I have conferred with counsel for Plaintiffs, Christopher Leung and Max Rodriguez, who confirmed that Plaintiffs consented to Hain Celestial's request for a further extension.

Respectfully submitted,

/s/ Dean N. Panos
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